

Law Offices of Special Hagan

88-08 Justice Avenue Apt. 16i
Elmhurst, NY 11373

INVOICE

Kaye, Melissa 2

517 Ortiz Dr.
Albuquerque, NM 87108

Invoice 10008

PRE-BILL

Date	May 26, 2022
Terms	N/A
Service Thru	May 26, 2022

In Reference To: Kaye v. H + H (Labor)

Date	By	Services	Hours	Rates	Amount
03/26/2020	SH	Correspondence: Letter to Oetken (Extension of Discovery Request) ECF Dkts. 77-78	11.00	\$ 350.00/hr	\$ 3,850.00
03/30/2020	SH	Correspondence: Letter to Cott regarding Request for Extension of Fact Discovery. ECF Dkt. 80	0.20	\$ 350.00/hr	\$ 70.00
04/03/2020	SH	Motion Practice: Letter Motion for Rule 37.2 Conference (ESI/Sanctions) ECF. Dkts. 83-84	2.00	\$ 350.00/hr	\$ 700.00
04/21/2020	SH	Motion Practice: Filed Objection to Judge Cott's Ruling, pursuant to Fed. R. Civ. P. 72(ESI/Sanctions) ECF. Dkts. 87-88	3.00	\$ 350.00/hr	\$ 1,050.00
09/16/2020	SH	Correspondence: Letter Motion to extend discovery. ECF. Dkt. 92	0.50	\$ 350.00/hr	\$ 175.00
09/30/2020	SH	Draft: Drafted and submitted Proposed Case Management Plan. ECF Dkt. 94	1.00	\$ 350.00/hr	\$ 350.00
10/08/2020	SH	Motion Practice: Motion for Local rule 37.2 Conference. ECF. Dkt. 98	1.00	\$ 350.00/hr	\$ 350.00
10/26/2020	SH	Motion Practice: Letter Motion to Compel Deposition of Catherine Patsos, Esq. ECF. Dkt. 100	1.00	\$ 350.00/hr	\$ 350.00
10/27/2020	SH	Court Time: Pre-Trial Conference. Associated with ECF. Dkt. 100	1.00	\$ 350.00/hr	\$ 350.00
10/27/2020	SH	Correspondence: Letter to Judge Cott, re. Patsos's failure to appear for her deposition. ECF. Dkt. 101.	0.20	\$ 350.00/hr	\$ 70.00
10/29/2020	SH	Correspondence: Letter to Judge Cronan. ECF Dkt. 103	0.50	\$ 350.00/hr	\$ 175.00
10/29/2020	SH	Motion Practice: Motion to Compel ESI/Discovery ECF. Dkts. 104-105.	2.00	\$ 350.00/hr	\$ 700.00

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10/29/2020	SH	Motion Practice: Motion to Compel ESI/Discovery. ECF Dkt. 104.	2.00	\$ 350.00/hr	\$ 700.00
10/30/2020	SH	Motion Practice: Letter Motion to Judge Cronan. ECF. Dkt. 106	2.00	\$ 350.00/hr	\$ 700.00
11/11/2020	SH	Motion Practice: Letter Response in further Support of Plaintiff's Motion to Compel and Sanctions. ECF Dkt. 109	2.00	\$ 350.00/hr	\$ 700.00
11/12/2020	SH	Correspondence: Status Update addressed to Judge Cronan. ECF Dkt. 111.	1.00	\$ 350.00/hr	\$ 350.00
11/18/2020	SH	Motion Practice: Draft and submission of Memo of Law in Support of Motion; Declaration in Support. ECF Dkts. 112-114 (Submissions and revisions entered between 11/18-11/19/20.	4.00	\$ 350.00/hr	\$ 1,400.00
11/19/2020	SH	Preparation of Subpoenas: Preparation of subpoenas and letter motion to Judge Cott. ECF Dkts. 115-117.	1.00	\$ 350.00/hr	\$ 350.00
11/23/2020	SH	Motion Practice: Letter Motion to Judge Cott (Motion to Compel Patsos; Plaintiff's Subpoenas to DOI and Board of Correction) ECF Dkt. 120	1.50	\$ 350.00/hr	\$ 525.00
11/23/2020	SH	Correspondence: Letter to Judge Cott. ECF. Dkt. 118	1.50	\$ 350.00/hr	\$ 525.00
11/24/2020	SH	Deposition: Deposition of Catherine Patsos.	8.00	\$ 350.00/hr	\$ 2,800.00
11/24/2020	SH	Deposition: Preparation for the deposition of Catherine Patsos.(11/15/20-11/18/20)	4.00	\$ 350.00/hr	\$ 1,400.00
12/03/2020	SH	Motion Practice: Filed Objection Pursuant to Fed. R. Civ. P. 72. ECF Dkt. 124	3.50	\$ 350.00/hr	\$ 1,225.00
12/03/2020	SH	Motion Practice: Reply in further support of Letter Motion addressed to Judge Cott. ECF Dkt. 123	2.00	\$ 350.00/hr	\$ 700.00
12/23/2020	SH	Motion Practice: Filed Objection to Judge Cott's Order Pursuant to Fed. R. Civ. P. 72. ECF Dkt. 126	3.00	\$ 350.00/hr	\$ 1,050.00

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12/30/2020	SH	Motion Practice: Letter Motion to Compel ESI. (ECF. Dkt. 129)	2.00	\$ 350.00/hr	\$ 700.00
01/03/2021	SH	Motion Practice: Letter Motion to Judge Cronan, requesting a ruling on Plaintiff's objections.	0.30	\$ 350.00/hr	\$ 105.00
01/03/2021	SH	Motion Practice: Letter Motion to Complete Discovery. (ECF Dkt. 130)	0.30	\$ 350.00/hr	\$ 105.00
01/04/2021	SH	Motion Practice: Letter Motion Response in support of Motion. (ECF Dkt. 133)	0.30	\$ 350.00/hr	\$ 105.00
01/04/2021	SH	Motion Practice: Letter in Response in Support of Motion. (ECF Dkt. 135)	0.50	\$ 350.00/hr	\$ 175.00
02/26/2021	SH	Deposition: Preparation for deposition of Patricia Yang. (Defendant) (February 26-27,2021)	5.00	\$ 350.00/hr	\$ 1,750.00
03/08/2021	SH	Correspondence: Letter to Cott requesting lifting of the stay. ECF Dkt. 139 (Joint Letter including phone conference w. Canfield)	1.00	\$ 350.00/hr	\$ 350.00
03/31/2021	SH	Zoom Deposition Prep: Zoom Deposition Prep Melissa Kaye. 3:44:10	3.80	\$ 350.00/hr	\$ 1,330.00
04/20/2021	SH	Correspondence: Letter to Court (Discovery Update). ECF Dkt. 144	0.30	\$ 350.00/hr	\$ 105.00
05/06/2021	SH	Motion Practice: Letter Motion Requesting Settlement Conference. (ECF. Dkt. 149)	0.30	\$ 350.00/hr	\$ 105.00
06/14/2021	SH	Motion Practice: Letter Motion to Stay Depositions re. Settlement Conference. (ECF Dkt. 152)	0.20	\$ 350.00/hr	\$ 70.00
06/14/2021	SH	Motion Practice: Joint Letter Motion to Request Settlement Conference. ECF. Dkt. 153	1.00	\$ 350.00/hr	\$ 350.00
06/29/2021	SH	Motion Practice: Letter Motion re. In Person Settlement Conference. (ECF. Dkt. 156)	0.30	\$ 350.00/hr	\$ 105.00

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07/08/2021	SH	Motion Practice: Letter Motion (Plaintiff's Response to Defendants' Request to Adjourn Settlement Conference) ECF. Dkt. 160	0.30	\$ 350.00/hr	\$ 105.00
07/15/2021	SH	Preparation for Court Conference: Preparation for Settlement Conference. Discussions with Kaye and research. Preparation took place over the course of several days during the week of July 13-20th.	3.00	\$ 350.00/hr	\$ 1,050.00
07/20/2021	SH	Settlement Conference: Settlement negotiations with Judge Cott, Canfield and Greenfield.	6.00	\$ 350.00/hr	\$ 2,100.00
07/26/2021	SH	Other: Joint Submission: Proposed Schedule for Fact & Expert Discovery. (ECF. Dkt. 162) Drafted letter and had phone call with Canfield.	1.50	\$ 350.00/hr	\$ 525.00
09/09/2021	SH	Motion Practice: Letter motion to compel the deposition of Dr. Barry Winkler. ECF. Dkt. 164	0.20	\$ 350.00/hr	\$ 70.00
09/13/2021	SH	Motion Practice: Response in further Support of Motion to Compel Deposition of Barry Winkler, Psy. J.D. (ECF. Dkt. 166)	0.30	\$ 350.00/hr	\$ 105.00
09/16/2021	SH	Motion Practice: Motion to Compel Meet and Confer. ECF. Dkt. 169	0.30	\$ 350.00/hr	\$ 105.00
09/17/2021	SH	Motion Practice: Motion to Compel Amended Submission. ECF. Dkt. 170	0.30	\$ 350.00/hr	\$ 105.00
09/17/2021	SH	Deposition: Preparation for the Deposition of Jonathan Wangel, Esq. (Defendant): September 17-September 19.	5.00	\$ 350.00/hr	\$ 1,750.00
09/20/2021	SH	Deposition: Deposition of Jonathan Wangel, Esq. (Defendant)	8.00	\$ 350.00/hr	\$ 2,800.00
09/27/2021	SH	Deposition: Preparation for the Deposition of Elizabeth Ford, M.D. (Defendant) ; Research (academic articles and Ford's Book; preparation of exhibits)	15.00	\$ 350.00/hr	\$ 5,250.00

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09/27/2021	SH	Deposition: Deposition of Elizabeth Ford, M.D. (Defendant)	8.00	\$ 350.00/hr	\$ 2,800.00
09/28/2021	SH	Deposition: Deposition of Andrea Swenson	8.00	\$ 350.00/hr	\$ 2,800.00
09/29/2021	SH	Motion Practice: Response in further opposition to Defendants' Letter Motion. ECF. Dkt. 174	0.30	\$ 350.00/hr	\$ 105.00
10/03/2021	SH	Deposition: Preparation for the deposition of Abhishek Jain, M.D.	5.00	\$ 350.00/hr	\$ 1,750.00
10/04/2021	SH	Deposition: Deposition of Abhishek Jain, M.D.> (Defendant)	8.00	\$ 350.00/hr	\$ 2,800.00
10/04/2021	SH	Motion Practice: Letter Motion for Local 37.2 Conference. ECF. Dkt. 176	0.30	\$ 350.00/hr	\$ 105.00
10/05/2021	SH	Deposition: Preparation for the Deposition of Barry Winkler, Psy. J.D.	5.00	\$ 350.00/hr	\$ 1,750.00
10/06/2021	SH	Deposition: Deposition of Barry Winkler, Psychiatrist. JD	8.00	\$ 350.00/hr	\$ 2,800.00
10/07/2021	SH	Deposition: Preparation for Deposition for Jeffrey Bloom, Esq. March 2020; and October 2021	12.00	\$ 350.00/hr	\$ 4,200.00
10/12/2021	SH	Deposition: Deposition of Jeffrey Bloom, Esq.	8.00	\$ 350.00/hr	\$ 2,800.00
10/14/2021	SH	Correspondence: Letter addressed to Judge Cott re: Defendants' Cancellation of the Depositions of Drs. Kaye and MacDonald. (ECF. Dkt. 177)	0.20	\$ 350.00/hr	\$ 70.00
10/18/2021	SH	Motion Practice: Letter Motion for Local 37.2 Conference (to Compel the production of Dr. Kaye's Personnel File, Performance Evaluation and Sanctions) (ECF. Dkt. 180)	0.80	\$ 350.00/hr	\$ 280.00
10/29/2021	SH	Motion Practice: Response in further support of Plaintiff's Motion for a Conference pursuant to Local Rule. 37.2. ECF Dkt. 183	0.50	\$ 350.00/hr	\$ 175.00

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11/09/2021	SH	Deposition: Preparation for Deposition of Ross MacDonald, M.D.	5.00	\$ 350.00/hr	\$ 1,750.00
11/12/2021	SH	Deposition: Deposition of Ross MacDonald, M.D.	8.00	\$ 350.00/hr	\$ 2,800.00
11/15/2021	SH	Deposition: Deposition of Melissa Kaye., M.D. (Plaintiff) (Direct)	8.00	\$ 350.00/hr	\$ 2,800.00
11/16/2021	SH	Motion Practice: Plaintiff's Opposition to Defendants' Motion for an Additional hour and thirty minutes to depose Dr. Kaye. (ECF. Dkt. 187)	0.80	\$ 350.00/hr	\$ 280.00
11/30/2021	SH	Motion Practice: Letter Motion to submit recorded transcript for Court's consideration; in further support of Plaintiff's opposition. (ECF. Dkt. 189)	0.20	\$ 350.00/hr	\$ 70.00
12/02/2021	SH	Motion Practice: Letter Motion to conduct Plaintiff's Deposition pursuant to Fed. R. Civ. P. 31 (via written interrogatories). ECF. Dkt. 191	0.20	\$ 350.00/hr	\$ 70.00
12/03/2021	SH	Motion Practice: Objection filed via Letter Pursuant to Fed. R. Civ. P. 72. ECF. Dkt. 194	2.00	\$ 350.00/hr	\$ 700.00
12/03/2021	SH	Motion Practice: Objection pursuant to Fed. R. Civ. P. 72 re. Order on Motion for Discovery. (ECF. Dkt. 197)	1.00	\$ 350.00/hr	\$ 350.00
12/10/2021	SH	Motion Practice: Letter Motion addressed to Judge Cronan; application to modify briefing schedule. ECF. Dkt. 206	0.10	\$ 350.00/hr	\$ 35.00
12/26/2021	SH	Motion Practice: Letter motion for leave to file excess pages addressed to Judge Cronan. (ECF Dkt. 200-204)	0.50	\$ 350.00/hr	\$ 175.00
01/03/2022	SH	Motion Practice: Letter Motion to Re-open Plaintiff's Deposition. (ECF. Dkt. 208)	0.80	\$ 350.00/hr	\$ 280.00
01/10/2022	SH	Motion Practice: Letter Motion in further support of Re-opening Dr. Kaye's Deposition (ECF. Dkt. 211)	0.30	\$ 350.00/hr	\$ 105.00

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01/24/2022	SH	Zoom Deposition Prep: Zoom Deposition Prep 2:43 minutes.	2.80	\$ 350.00/hr	\$ 980.00
01/25/2022	SH	Deposition: Deposition of Melissa Kaye, M.D. Cross Examination 1/25/22	1.50	\$ 350.00/hr	\$ 525.00
01/26/2022	SH	Motion Practice: Letter Motion (Reply) to Defendants' Motion to Re-Open Plaintiff's Deposition. (ECF. Dkt. 217)	0.40	\$ 350.00/hr	\$ 140.00
01/31/2022	SH	Deposition: Zoom Deposition preparation of Dr. Melissa Kaye. 1:36:13	2.60	\$ 350.00/hr	\$ 910.00
02/02/2022	SH	Zoom Deposition Prep: Zoom deposition prep of Dr. Melissa Kaye, 3:44:24	3.80	\$ 350.00/hr	\$ 1,330.00
02/03/2022	SH	Deposition: Deposition of Melissa Kaye, M.D. (Re-Direct)	1.50	\$ 350.00/hr	\$ 525.00
02/14/2022	SH	Motion Practice: Letter Motion (Reply) Second Request for an extension to brief Summary judgment motion. (ECF. Dkt. 222)	0.30	\$ 350.00/hr	\$ 105.00
02/28/2022	SH	Deposition: Deposition of Patricia Yang. (Defendant)	8.00	\$ 350.00/hr	\$ 2,800.00
05/17/2022	SH	Motion Practice: Summary Judgment: Responses to 56.1 Motion	12.00	\$ 350.00/hr	\$ 4,200.00
05/18/2022	SH	Motion Practice: Responses in Opposition to Defendants' Motion for Summary Judgment 56.1	12.00	\$ 350.00/hr	\$ 4,200.00
05/18/2022	SH	Motion Practice: Responses in Opposition to Defendants' Motion for Summary Judgment 56.1	12.00	\$ 350.00/hr	\$ 4,200.00
05/24/2022	SH	Motion Practice: Drafting of Dr. Kaye's Declaration in Support of Plaintiff's Opposition to Defendants' Motion for Summary Judgment.	6.00	\$ 350.00/hr	\$ 2,100.00

Total Hours 268.00 hrs**Total Labor** \$ 93,800.00

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Total Invoice Amount \$ 93,800.00

Previous Balance \$ 0.00

Balance (Amount Due) \$ 93,800.00
